

Wildlife Restoration/Hunter Education Advisory Team



Advisory 2020-019: Funding personal services costs such as endorsements of celebrities as part of R3 – Wildlife Restoration grants

August 27, 2020

(1) Can a State fish and wildlife agency pay for endorsements (as presented in marketing campaigns) from celebrities (e.g., Olympic shooters, Hunting and Shooting show personalities, athletes) as part of costs in an R3 awareness campaign for recreational shooting and hunting?

Discussion: The Advisory Team considers costs of celebrity endorsements (promotion of R3 activities in commercials, ads, or YouTube videos, etc.) to be eligible when those activities benefit the objectives of a grant to recruit, retain, or reactivate hunters and/or recreational shooters as supported at §200.421 Advertising and public relations -

(b) The only allowable advertising costs are those which are solely for:

(4) Program outreach and other specific purposes necessary to meet the requirements of the Federal award.

Advisory: Costs of paying for celebrity endorsements would be considered eligible in an R3 grant when described in the Approach section of a grant as a mechanism to meet grant objectives. The costs must be necessary and reasonable in promoting awareness and opportunities to hunt or shoot. A State should describe the cost/benefits and how the costs can be supported as reasonable.

The costs for celebrity endorsements to support an R3 award would be considered eligible using funds at:

16 U.S.C. 669c(c) (Basic Hunter Education or R3) – for R3 activities only

16 U.S.C 669h-1 (Enhanced Hunter Education/R3)

(2) Can a State fish and wildlife agency pay for celebrity appearances at events to raise awareness and educate participants as part of an R3 activity?

Discussion: Speaker's fees, as part of R3 workshop or event, for messaging about the contribution hunters and recreational shooters make to supporting wildlife management or the funding of conservation would be considered eligible. States should ensure that paid speakers enhance the knowledge of the audience in support of the objectives of the grant. This is supported at §200.432 Conferences (As amended August 13, 2020)... *Allowable conference costs paid by the non-Federal entity as a sponsor or host of the conference may include... speakers' fees... Conference hosts/sponsors must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award.*

Advisory: Costs of paying for celebrity appearances would be considered eligible in an R3 grant when described in the Approach section of a grant as a mechanism to meet grant objectives. The costs must be necessary and reasonable in promoting awareness and opportunities to hunt or shoot. A State should describe the cost/benefits and how the costs can be supported as reasonable.

The costs for celebrity appearances to support an R3 award would be considered eligible using funds at:

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